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MAY 30 2017

## NOTICE OF PRELIMINARY FINDINGS

AWMD/WEMM

FACILITY NAME: Iowa Mold Tooling Company, Inc.  
ADDRESS: 500 Hwy 18 W  
Gurnee, IA 50438  
EPA ID NUMBER: IAD005286539 DATE: 05/19/2017

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. Failed to conduct weekly inspections of a hazardous waste container accumulation area 40 CFR 262.34(a)(1)(i) → 265.174
2. Failed to include hazardous waste-related duties in written job descriptions for personnel who manage hazardous waste 40 CFR 262.34(a)(4) → 265.16(d)(2)
3. Failed to have written description of type & amount of introductory and continuing training for personnel who manage hazardous waste 40 CFR 262.34(a)(4) → 265.16(d)(3)
4. Failed to provide hazardous waste training for all personnel who manage hazardous waste 40 CFR 262.34(a)(4) → 265.16
5. Failed to include evacuation plans & alternate evacuation routes in the Contingency Plan 40 CFR 262.34(a)(4) → 265.52(f)
6. Failed to make an adequate hazardous waste determination on waste Multispec 40 CFR 262.11
7. \_\_\_\_\_

If you have any questions regarding these findings please contact Mr. Gary Witkowski, USEPA

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Jim Hasty TITLE: VP/GM

SIGNATURE: [Signature]

This document was prepared by John D. Dixon / [Signature]

RCRA



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